

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ZACKARY ELLIS SANDERS,**

**Defendant.**

**Case No. 1:20-cr-00143  
The Honorable Judge Ellis**

**Trial: October 19, 2021**

**HEARING REQUESTED**

**MOTION TO SUPPLEMENT THE RECORD AND RENEW HIS MOTION TO  
COMPEL EXCULPATORY MATERIAL OR, IN THE ALTERNATIVE, TO SUBMIT  
EXCULPATORY MATERIAL FOR *IN CAMERA* REVIEW**

Zackary Ellis Sanders, by and through counsel, respectfully submits this Memorandum in Support of his Motion to Supplement the Record and Renewed Motion to Compel or, in the Alternative, for *In Camera* Review. A memorandum in support accompanies this Motion.

Respectfully submitted,

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/s/

Jonathan Jeffress (#42884)  
Jade Chong-Smith (admitted *pro hac vice*)  
KaiserDillon PLLC  
1099 Fourteenth St., N.W.; 8th Floor—West  
Washington, D.C. 20005  
Telephone: (202) 683-6150  
Facsimile: (202) 280-1034  
Email: jjeffress@kaiserdillon.com  
Email: jchong-smith@kaiserdillon.com

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/s/

Nina J. Ginsberg (#19472)  
Zachary Deubler (#90669)  
DiMuroGinsberg, P.C.  
1101 King Street, Suite 610  
Alexandria, VA 22314  
Telephone: (703) 684-4333

Facsimile: (703) 548-3181  
Email: nginsberg@dimuro.com  
Email: zdeubler@dimuro.com

*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of August 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress  
Jonathan Jeffress